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February 13, 2002

02-RF-00428

Barbara A. Mazurowski
Manager
DOE, RFFO

SITE SAFETY CONTINUOUS IMPROVEMENT PLAN – AMP-005-02

Ref: Alan M. Parker ltr AMP-002-01 to Barbara A. Mazurowski, Site Safety Improvement Plan (SSIP), April 18, 2001

Dear Barbara:

The purpose of this letter is to transmit our Site Safety Continuous Improvement Plan (Attachment 1). This plan is submitted for your review and approval as part of our ongoing effort to continuously improve safety at the Site. It includes the ongoing actions from our referenced Site Safety Improvement Plan (SSIP) and new actions from our analysis of our 2001 performance. As the Chief Executive and Operating Officers we recognize our personal roles in achieving continuous improvement. Our entire management team is committed to this effort and is personally accountable for its effectiveness.

The plan is divided into five sections that correspond to the key areas that we believe must be focused on to continuously improve safety at the Site. The sections are:

- 1) Leadership of Safety
- 2) Safety Culture
- 3) Work Planning
- 4) Analysis & Assessments
- 5) Lessons Learned & Corrective Action Effectiveness

The plan will be a "living document," which supports our continuing commitment to Integrated Safety Management (ISM) especially the feedback from our workers and our safety performance on the job.

We believe that our combined efforts last year led to many safety improvements, however, safety problems and lapses still occur and we are committed, along with you, to "Never be satisfied with our safety performance!"

February 13, 2002
Barbara A. Mazurowski
AMP-005-02
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The following items are the key concerns that this plan is designed to address. These are the areas where we believe we are most vulnerable and/or where we have had problems achieving consistent performance.

- Electrical Safety
- Fall Protection
- Hoisting and Rigging
- Cuts and Fractures
- Contamination Control (radiological and Be)
- Traffic and mobile equipment safety
- Scope definition and hazard identification
- Planning for and response to unexpected conditions
- Individual compliance with posted limits
- Support/Control of non-project personnel
- Control of chemicals

Revisions to the plan will be transmitted to RFFO and we wish to continue the quarterly status reviews to report progress and identify developing issues. Many of the actions in this plan are continuing in nature but have a completion date for the initial task. In our updates we will present the ongoing efforts intended to reinforce these key actions. We also look forward to meeting with you and your staff to review this plan and incorporating your comments.

We look forward to our ongoing partnership with RFFO, especially in this critical area of worker and public safety.

Respectfully,



Alan M. Parker
President and
Chief Executive Officer
Kaiser-Hill Company, LLC



Nancy R. Tuor
Executive Vice President and
Chief Operating Officer
Kaiser-Hill Company, LLC

KPP:maa

Attachment:
As Stated


Original and 1 cc – Barbara A. Mazurowski

cc:
Hank Dalton – DOE, RFFO
Charles Dan – DOE, RFFO
Joe Legare – DOE, RFFO
Don Owen - DNFSB
Dero Sargent – DOE, RFFO

Site Safety Continuous Improvement Plan

Revision 1

February 13, 2002



Alan Parker, President & CEO



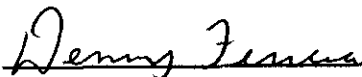
Nancy Tuor, Executive Vice President & COO



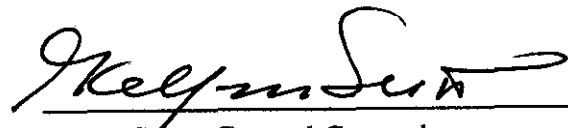
Marvin Brailsford, Material Stewardship



Ken Powers, SE&QP



Denny Ferrera, RISS




Gregg Scott, General Counsel



Mark Ferri, 707/776 Project Manager



Mark Spears, 371 Project Manager



Len Martinez, Administration



Kelly Trice, 771 Project Manager

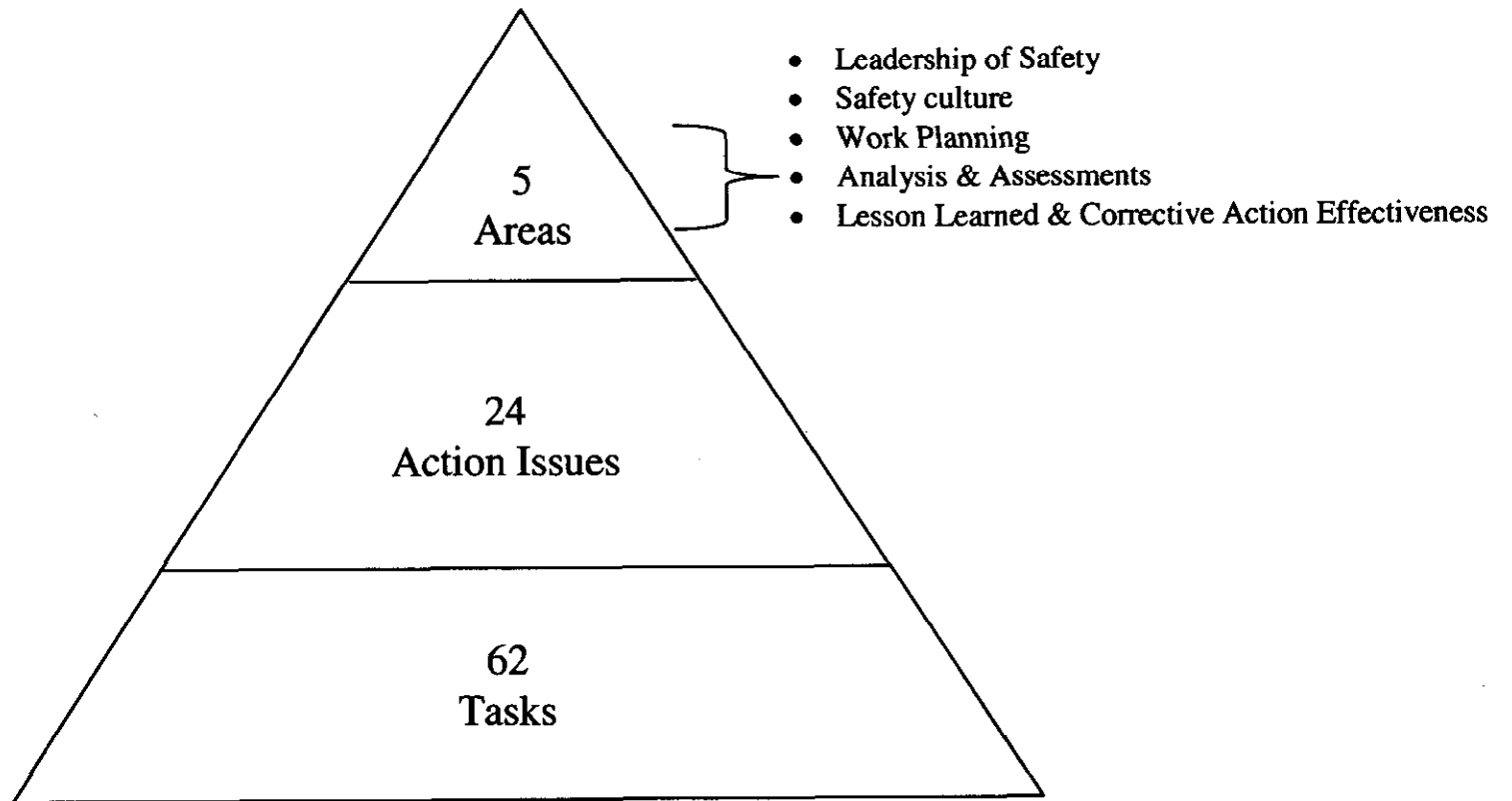


Dave Shelton, Environmental

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SITE SAFETY CONTINUOUS IMPROVEMENT PLAN



Overview Site Safety Continuous Improvement Plan

AREAS	Leadership of Safety	Safety Culture	Work Planning	Analysis & Assessments	Lessons Learned & Corrective Action Effectiveness
Action Issues	SAC	Situational awareness and response training - Hoisting/rigging - Chemicals - Fall Protection - Electrical - Be cleanup strategy	Mentoring	ABC analysis	Continuing training
	CEO/COO Involvement	Safety attitude training for Supervisors	RM/ Planning Team training workshops	Quarterly health reports	Continuous improvement of communication • Safety Flashes • Toolboxes
	COE/ JCUSC	Asking for & giving safety help • TRT	Programmatic improvements, including Post-job feedback	Streamline and focus self-assessment	Contamination Control awareness video
	Allocation of experienced safety resources	Support for non-Project organizations and personnel		Joint team assessments	
	Partnering	Communications with CCA's (<i>Combined with Support for non-Project orgs & personnel</i>)		Benchmark other sites	
		Compliance with criticality controls		Cuts/ Fractures analysis	
				Carry over pending SSIP assessments	

Detailed

Safety Continuous Improvement Plan

Tasks

**Safety Continuous Improvement Plan
I. Leadership of Safety**

Action	Deliverable	Responsible Manager	Due Date
Safety Assessment Center (SAC) <ul style="list-style-type: none"> Continue evolving the SAC Process; incorporate the following enhancements: <ul style="list-style-type: none"> PAAA Screening Criteria Assessment Review Process Data collection/ sources Tracking & trending protocols (Assessment, PAAA, PATS, etc.) ISM linkage 	SAC procedure revision	Powers	5/1/02
CEO/COO Involvement <ul style="list-style-type: none"> COO attend SAC routinely Continue weekly safety meetings with senior management and union representatives Focus senior staff on key safety issues through weekly staff meetings and monthly strategy meetings Work with DOE Executive Safety Conference to balance requirements with risk 	Summary of topics discussed/ actions taken in meetings Summary of safety issues discussed at weekly and monthly meetings Summary of results of discussions on balancing requirements with risk	Tuor Powers Parker Parker	12/31/02 12/31/02 12/31/02
COE/JCUSC <ul style="list-style-type: none"> Conduct an independent assessment of COE effectiveness in using lessons learned for continuous improvement (key COE's: IH, IWCP, RAD, Fire Protection, Nuclear Safety, Criticality Safety) Continue efforts to resolve safety concerns verbally at the floor level Track and trend safety concern resolution 	Assessment reports Monthly graphic: record of verbal safety concerns resolved Graphic summary of tracking/ trending data	Powers Powers Powers	12/31/02 8/31/02 8/31/02

**Safety Continuous Improvement Plan
I. Leadership of Safety**

Action	Deliverable	Responsible Manager	Due Date
Allocation of resources <ul style="list-style-type: none"> • Promulgate expectations for Safety Tech Assistants • Assign selected steelworkers as Safety Tech Assistants to Building Trades and contractors • Evaluate the use of experienced site personnel for additional functions supporting safety; establish JCUSC concurrence and assign personnel • Evaluate and adjust as necessary span of control and amount of management focus for higher risk activities 	<p>Memorandum of expectations List of steelworkers assigned</p> <p>Memorandum of JCUSC concurrence and summary of assignments</p> <p>Quarterly evaluation results and summary of assignments</p>	<p>Powers Powers</p> <p>Powers</p> <p>Project Managers</p>	<p>3/1/02 3/30/02</p> <p>4/30/02</p> <p>5/30/02</p>
Safety Partnering <ul style="list-style-type: none"> • Continue Joint Safety Partnering Initiative • Incorporate enhancements <ul style="list-style-type: none"> - Evaluate new Performance Indicators tied to ISM as needed - Improve assessment data reviews - Develop appropriate review topics that concentrate on safety focus areas 	<p>Meeting agendas</p> <p>Safety Partnering recommendations</p> <p>Monthly review of data List of topics</p>	<p>Powers</p> <p>Powers</p> <p>Powers Powers</p>	<p>12/31/02</p> <p>7/1/02</p> <p>4/30/02 3/31/02</p>

**Safety Continuous Improvement Plan
II. Safety Culture**

Action	Deliverable	Responsible Manager	Due Date
Situational awareness and response training <ul style="list-style-type: none"> • Conduct information blitz to raise awareness in key safety areas (hoisting/rigging, chemicals, fall protection, electrical, etc.) • Develop training materials for key safety areas and identify target populations • Collect, analyze and use event and assessment data to prepare and update continuing training (recurring worker brief) • Incorporate lessons learned into select site training courses 	Plan for information blitz	Powers	3/30/02
	Training materials and target populations	Powers	5/30/02
	Quarterly review of weekly SAC reports; resulting continuing training briefs	Powers	7/15/02
	Training course revisions	Powers	6/30/02
Develop safety attitude enhancement program	Program description document	Powers	6/30/02
Asking for and giving safety help <ul style="list-style-type: none"> • Continue effective use of Technical Response Teams. Confirm effectiveness with semi-annual evaluations 	Semi-annual evaluation reports	Powers	8/31/02
Perform safety improvement plan evaluation survey to assess the change in site safety culture since the baseline survey done for the SSIP. <ul style="list-style-type: none"> • Evaluate results of the survey for safety culture deficiencies, and address with actions in the SSCIP 	Report of survey results.	Tuor	4/30/02
		Powers	5/30/02
Support for non-Project organizations and personnel <ul style="list-style-type: none"> • Complete Action Plan for Control of Non-Project Personnel Working in Project Facilities, including emphasis on communications with CCA's • Develop metric to track and trend control, supervision and performance of non-Project personnel • Establish expectations for minimum Project oversight/ supervision of non-Project personnel 	Memorandum certifying that Action Plan is complete	Powers	5/1/02
	Metric which displays non-Project personnel performance during Project work	Powers	5/1/02
	Memorandum to Project Managers setting expectations	Tuor/Powers	5/1/02

**Safety Continuous Improvement Plan
II. Safety Culture**

Action	Deliverable	Responsible Manager	Due Date
<p>Compliance with Criticality Controls</p> <ul style="list-style-type: none"> • Complete CAP listed in Powers letter 003-02 • Use SAC data to prepare and update continuing training recurring brief for fissile material handlers and supervisors • Identify the need for update of select criticality safety training courses to emphasize individual responsibility for compliance with posted limits. Update as necessary. • Review NSM 3.12 process. Revise or delete as appropriate. 	<p>Memorandum reporting completion Continuing training brief</p> <p>Memorandum identifying course material revised</p> <p>Report with recommendations. Memorandum identifying actions taken.</p>	<p>Powers Powers</p> <p>Powers</p> <p>Powers</p>	<p>6/1/02 6/1/02</p> <p>7/1/02</p> <p>7/1/02</p>

**Safety Continuous Improvement Plan
III. Work Planning**

Action	Deliverable	Responsible Manager	Due Date
Develop mentoring guidance	COO memorandum setting out guidance	COO	Complete
Execute guidance in Projects	Documentation in accordance with COO memorandum	Project Managers	5/30/02
Training for key work planning personnel			
• Conduct steam valve case study for RM's, Planners, Engineers and Job Supervisors	Training outline and attendance rosters	Powers	4/30/02
• Develop ongoing tailored workshops for RM's, Job Supervisors and Planning Teams	Workshop content	Powers	6/30/02
Programmatic Improvements			
• Revise IWCP Manual to require Post Job Review and to add Planning Guide and Hazard, Control and Compliance Analysis Tool (HCCAT)	IWCP revision	Powers	3/28/02
• Revise Planner Continuing Training to reflect IWCP Rev. 4	Revised training	Powers	3/28/02
• Review ISM Manual for update	Updated Manual	Powers	8/31/02
• Review IWCP Manual for update	Updated Manual	Powers	8/31/02

**Safety Continuous Improvement Plan
IV. Analysis & Assessments**

Action	Deliverable	Responsible Manager	Due Date
Develop Antecedent/Behavior/Consequence (ABC) analysis process	Process description and training plan	Powers	5/30/02
Quarterly Health Reports <ul style="list-style-type: none"> Use Quarterly Health Reports and 90-day Look-ahead to drive subsequent assessments Continue joint team assessments for key areas as determined in quarterly analysis 	90-day Look-ahead and Quarterly Health Report indicating planned assessments List of joint team assessments	Powers Powers	10/30/02 10/30/02
Streamline and focus self-assessment <ul style="list-style-type: none"> Modify site infrastructure to support full implementation of the improved self-assessment process site-wide Develop a site-wide implementation plan Brief key personnel on the approved infrastructure changes and implementation strategy Implement modified self-assessment process site-wide Conduct independent assessment of implementation of the modified self-assessment process 	Revised documents related to self-assessment Implementation Plan Summary of changes; implementation strategy briefed Executed implementation plan Assessment report	Powers Powers Powers Powers	2/4/02 3/4/02 3/4/02 4/15/02 7/1/02
Benchmark other sites for key safety focus areas	Benchmarking reports	Powers	12/31/02
Perform analysis of CY01 significant recordables (cut and fracture analysis)	Analysis report	Powers	3/15/02
Conduct an assessment of the effectiveness of tracking/trending and action plan development in evaluating SMP's and driving continuous improvement.	Assessment Report	Powers	6/30/02
Perform a cross-Project effectiveness assessment to evaluate the quality of the work packages produced, use of post-job review, and administrative completeness. This assessment should evaluate the effectiveness of measures installed to provide safety help to work teams, including Technical Response Teams.	Assessment Report	Powers	4/15/02

Conduct assessments of controls of confined space, fire protection, fall protection and LO/TO.	Assessment reports	Powers	9/30/02
Conduct an assessment of the revision of the ISMS Manual.	Assessment Report	Powers	6/30/02
Perform an assessment of the FF/CA process.	Assessment Report	Powers	6/30/02
Assess the effectiveness of implementation of the Lessons Learned program.	Assessment report.	Powers	9/30/02

Safety Continuous Improvement plan
V. Lessons Learned & Corrective Action Effectiveness

Action	Deliverable	Responsible Manager	Due Date
Continuing training <ul style="list-style-type: none"> Establish mechanism to support topics/delivery 	Process delivery description	Powers/ Project Managers	4/28/02
<ul style="list-style-type: none"> Conduct Needs Analysis based on performance 	Needs Analysis approved by Union Training Committee and Training COE	Powers	4/28/02
<ul style="list-style-type: none"> Screen needs for audience/associated risk/time required/frequency 	Training Plan by Project/discipline (if required by Needs Analysis)	Powers/ Project Managers	5/19/02
<ul style="list-style-type: none"> Initiate continuing training based on topic/frequency recommended by analysis 	Training scheduled in TSR (if required by Needs Analysis)	Powers	6/10/02
Continue effective safety communications <ul style="list-style-type: none"> Continue to make Safety Flashes fit the audience; conduct periodic review to evaluate quality, obtaining worker feedback 	Reports of periodic review	Powers	7/31/02
<ul style="list-style-type: none"> Monitor effective dissemination of Safety Flashes 	Memoranda from Project Managers to Powers with results of monitoring	Project Managers	12/31/02
Create Contamination Control Awareness video	Awareness video	Powers	8/31/02
Implement a streamlined Corrective Action process. <ul style="list-style-type: none"> Issue revised CAP-001 and implementation plan 	Revised CAP-001, implementation plan	Powers	3/15/02
<ul style="list-style-type: none"> Eliminate the SCARM, revise the QAPM 	DCF to eliminate SCARM and revise QAPM	Powers	3/15/02
<ul style="list-style-type: none"> Conduct orientations 	Rosters, handouts	Powers	4/15/02